

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

This Document Relates to:

Bland, et al. v. Ameridose, LLC, et al.
1:13-cv-11881-FDS

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) MDL No. 1:13-md-2419-FDS
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PLAINTIFFS' MOTION TO AMEND COMPLAINT

Plaintiffs, Carolyn and Leon Bland, pursuant to Rule 15(a)(2), Fed. R. Civ. Pro., move this Court for an Order granting Plaintiffs leave to file and serve their Second Amended Complaint. Copy attached as Exhibit 1.

Plaintiffs also file a Memorandum in Support of their Motion to Amend along with a Certificate in accordance with LR 15.1 stating that the Motion to Amend has been served in advance on the new parties.

Pursuant to LR 7.1(a)(2), counsel for Plaintiffs certify that they have conferred and/or attempted in good faith to resolve the motion or narrow the issue. Counsel for the new parties, Saint Thomas West Hospital, Saint Thomas Network and Saint Thomas Health, has indicated that the new parties do not oppose this amendment but specifically reserve any and all defenses available to them.

For the reasons set forth, Plaintiffs move this Court for an Order granting Plaintiffs leave to file and serve the attached Second Amended Complaint.

Respectfully submitted,

LEADER, BULSO & NOLAN, PLC

/s/ William D. Leader, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and a paper copy will be sent by U.S. Mail to those indicated as non-registered participants including

Lela Hollabaugh
Attorney for Saint Thomas West Hospital, Saint
Thomas Network and Saint Thomas Health
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on this 2nd day of October 2013.

/s/ William D. Leader, Jr.

William D. Leader, Jr.